

# **EXHIBIT 290**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, et al;	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION
	)	FILE NO: 1:17cv02989-AT
BRAD RAFFENSPERGER, et al.;	)	
	)	
	)	
Defendants.	)	
	)	
	)	

**FULTON COUNTY DEFENDANTS' RESPONSE TO COALITION  
PLAINTIFFS' SECOND REQUESTS FOR ADMISSION**

COME NOW, the Members of the Fulton County Board of Registration and Elections, and hereby respond to this Response to Plaintiffs' Second Request for Admission.

**REQUESTS FOR ADMISSION**

1. Admit that You did not preserve until the present time the majority of ballot images from in-person voting for the November 3, 2020 election original machine count.

**Response: Admitted.**

2. Admit that You did not preserve until the present time the majority of ballot images from in-person voting for the June 19, 2020 election.

**Response: Admitted.**

3. Admit that You did not preserve until the present time the majority of ballot images from in-person voting for the August, 2020 election.

**Response: Admitted.**

4. Admit that one of Your Dominion tabulating servers crashed during the machine recount of the November 3, 2020 election.

**Response: Admitted.**

5. Admit that the Dominion tabulating server crash was reported to the Fulton County Board of Registration and Elections during the recount of the November 3, 2020 election.

**Response: Admitted.**

72. Admit that during 2020 the Fulton Board of Elections conducted meetings (including electronic meetings by email) with a quorum of members without advance public notice.

**Response: Denied.**

Respectfully submitted this 30<sup>th</sup> day of August, 2021.

**OFFICE OF THE COUNTY  
ATTORNEY**

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WINGATE, AND THE FULTON  
COUNTY BOARD OF  
REGISTRATION & ELECTIONS

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